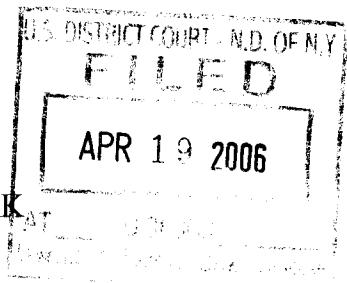


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UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF NEW YORK



UNITED STATES OF AMERICA,

Criminal No. 5:06-CR- 140 (FJS)

v.

JAMES G. RUSSELL, JR.,

INDICTMENT

VIO: Title 29, U.S.C. § 501(c)
(Felony)

Defendant.

THE GRAND JURY CHARGES:

COUNT 1

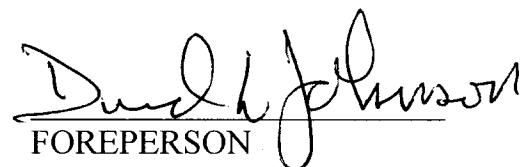
1. That, at all times material to this Indictment the International Alliance of Theatrical Stage Employees ("IATSE") Local 9, P.O. Box 617, Teall Station, Syracuse, N. Y. 13201-0617 was a labor organization engaged in an industry affecting commerce, within the meaning of Sections 402(i) and 402(j) of Title 29, United States Code.

2. At all times material to this Indictment the defendant, **JAMES G. RUSSELL, JR.**, was an officer as that term is defined in Section 402(n) of Title 29, United States Code, that is, Treasurer of the IATSE Local 9.

3. From on or about April 24, 2001 through June 30, 2005, in the Northern District of New York, **JAMES G. RUSSELL, JR.** did embezzle, steal, and unlawfully and willfully abstract and convert to his own use the monies, funds, property, and other assets of Local 9 in the approximate amount of \$54,776.65, in violation of Title 29, United States Code Section 501(c).

Dated: April 19th, 2006

A TRUE BILL,



FOREPERSON

GLENN T. SUDDABY
UNITED STATES ATTORNEY
NORTHERN DISTRICT OF NEW YORK

By:



Richard R. Southwick
Assistant U.S. Attorney
Bar Roll #506265